

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

ANDREW KRUECK

Debtor

Chapter 13

Bankruptcy Case No. 19-15344

DEBTORS' MOTION FOR AUTHORITY TO SELL REAL ESTATE

Andrew Krueck, by and through his attorney Gary E. Thompson, hereby requests the entry of an Order (a proposed form of which is annexed hereto) approving the sale of real estate, and in support thereof, respectfully represents the following:

1. Debtor filed a voluntary Chapter 13 Bankruptcy on August 27, 2019, bearing case number 19-15344.
2. The Debtor has disclosed an interest in real property improved by a single family residence located at 387 Century Oak Drive, Oxford, PA 19363("Property") with a first mortgage on the Property in favor of Wells Fargo Home Mortgage.
3. After extensively marketing the property and negotiating with various potential buyers, Debtor has entered into an Agreement for the Sale of Real Estate(the "Sale Agreement"), with Steven and Crystal Atwood ("Buyers") for \$339,000.00.
4. Given the marketing effort and current economic conditions, the sale on these terms approximates the fair market value of the property.

5. The terms of the Proposed Sale are fair and equitable and that any delay in consummating the Proposed Sale may result in the loss of Buyers as a potential purchaser, in which case a sale on more favorable terms may not be possible.
6. Out of the proceeds from the Sale, the secured lienholder, Wells Fargo Home Mortgage will be paid in full.
7. Debtor will be receiving approximately \$10,000.00 in proceeds from the sale, and despite the fact the Debtor is legally entitled to exempt proceeds from the sale, he has agreed to pay the proceeds to the Trustee for the benefit of All Creditors.
8. Accordingly, the Debtor request entry of the proposed order, substantially in the form annexed hereto, which would approve the terms and conditions of the sale.

WHEREFORE, the Debtor respectfully requests entry of an Order, substantially in the form annexed hereto, granting the relief requested in the Motion and authorizing the Sale of Real Estate of the Debtors.

Dated: November , 2019

Gary E. Thompson, Esquire
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610-431-3399

Attorney for the Debtor

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ORDER

And now, this _____ day of _____ 2019, upon consideration of Debtors' Motion for Authority to Sell Real Estate, and any responses filed thereto, IT IS
HEREBY

ORDERED that the Debtor is granted authority to sell the real property located at 387 Century Oak Drive, Oxford, PA 19363.

J.